IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.) Case No. 05-06025-01-BCW
JEFFREY S. THOMAS,)
Defendant.)

MOTION TO CONTINUE FINAL SUPERVISED RELEASE HEARING

COMES NOW the defendant, Jeffrey S. Thomas, by and through his counsel, Todd M. Schultz, Assistant Federal Public Defender for the Western District of Missouri, and moves this Court continue the final supervised release hearing.

SUGGESTIONS IN SUPPORT OF MOTION FOR CONTINUANCE

- 1. On March 8, 2021, Mr. Thomas appeared before the Honorable Jill A. Morris for the initial revocation hearing.
- The office of the Federal Public Defender was appointed to represent Mr.
 Thomas.
- 3. On March 12, 2021, Mr. Thomas appeared before the Honorable Jill A. Morris for the preliminary revocation hearing. The final revocation hearing is scheduled for April 21, 2021.
- 4. Counsel has had difficulty scheduling a legal visit with Mr. Thomas by video conference, therefore a continuance is needed. A legal visit with Mr. Thomas has been scheduled for Monday, April 26, 2021 to discuss the violation reports.
 - 5. The government does not object to this continuance request.

WHEREFORE, the defendant, Jeffrey S. Thomas, by counsel, respectfully requests this Court continue the final supervised release hearing until a date after April 26, 2021.

Respectfully submitted,

/s/ Todd M. Schultz
Todd M. Schultz
Assistant Federal Public Defender
1000 Walnut, Suite 600
Kansas City, MO 64106
816-471-8282
todd_m_schultz@fd.org

CERTIFICATE OF SERVICE

It is CERTIFIED that the foregoing was electronically filed on this 19th day of April, 2021, and that a copy was e-mailed to all parties pursuant to the ECF system.

/s/ Todd M. Schultz
Todd M. Schultz